

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:22-cv-81447-AMC

NELSON FERNANDEZ,

Plaintiff,

v.

TAPESTRY, INC. d/b/a KATE SPADE,
a foreign for profit corporation,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant Tapestry, Inc. d/b/a Kate Spade (“Tapestry”), by and through undersigned counsel, respectfully moves this Court for a brief extension of time to file its response to Plaintiff Nelson Fernandez’s (“Plaintiff”) Complaint [D.E. 1], and states as follows:

1. Plaintiff filed his Complaint on September 16, 2022.
2. Tapestry’s deadline to respond to Plaintiff’s Complaint is October 11, 2022.
3. Counsel for Tapestry was recently retained in this matter and requires additional time to formulate its response.
4. Tapestry respectfully requests a brief extension of time of 14 days to respond to Plaintiff’s Complaint. This request for extension of time is made in good faith and not for purpose of delay.
5. No party, nor this Court, will be prejudiced if the requested extension is granted.

WHEREFORE, Defendant Tapestry, Inc. d/b/a Kate Spade requests an extension of time up to and including October 25, 2022 to file its response to Plaintiff’s Complaint. Undersigned counsel certifies that the instant Motion complies with the Local Rules and the Court’s Orders.

LOCAL RULE 7.1(A)(3) CERTIFICATION

Counsel for Defendant Tapestry conferred with counsel for Plaintiff via email on October 11, 2022, and Plaintiff's counsel does not oppose the relief requested herein.

Respectfully submitted,

By: /s/ Nelson C. Bellido
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*Attorneys for Defendant
Tapestry, Inc. d/b/a Kate Spade*

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of October, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive Notices of Electronic Filing.

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By: /s/ Nelson C. Bellido
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